

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOSHUA WINER,

Plaintiff,

v.

UMAYMAH MOHAMMAD, et. al.,

Defendants.

Civil Action No.: 1:25-cv-02329-TWT

**CONSENT MOTION FOR (I) EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO COMPLAINT AND (II) TO EXTEND TIME
FOR PLAINTIFF'S RESPONSE TO ANY MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.1, Plaintiff Joshua Winer ("Plaintiff") and Defendants WESPAC Foundation, Inc. ("WESPAC") and Doctors Against Genocide ("DAG") (collectively, "Defendants") file this consent motion to extend the time for Defendants to file an answer or otherwise respond to Plaintiff's operative amended complaint through August 28, 2025, and for Plaintiff to be permitted to respond to any motion to dismiss filed by Defendants as to the complaint through November 7, 2025.

1. According to Plaintiff's affidavit of service, WESPAC was served on or about June 17, 2025 with a copy of the amended complaint, which would make WESPAC's responsive deadline July 8, 2025.
2. According to Plaintiff's affidavit of service, DAG was served on or about June 19, 2025 with a copy of the amended complaint, which would make DAG's responsive deadline July 10, 2025.
3. Given defense counsel's schedule and the volume of the complaint, Plaintiff has agreed to stipulate to extend the time for Defendants to file an answer or motion to dismiss through August 28, 2025.
4. Counsel for Defendants has agreed and stipulated to extend the time for Plaintiff to respond to Defendants' anticipated motions to dismiss, so that Plaintiff will have through November 7, 2025 to file his response.
5. This consent motion is made in good faith and no party will be prejudiced as a result of the extension.
6. A proposed order reflecting the agreed-upon extension of time is submitted with this motion.

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Dated: July 14, 2025

Respectfully submitted,

THE SECRET FIRM PC

~~Akil Secret~~

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/s/ Muneer O. Awad

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Counsel for Plaintiff

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: July 14, 2025

A handwritten signature in black ink, appearing to read 'Akil Secret', is written over a horizontal line.

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